

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	
)	Case No. 4:19-cv-00415
ALEXANDRU BITTNER,)	
Defendant.)	
_____)	

**UNITED STATES' UNOPPOSED MOTION TO EXTEND THE DEADLINE TO FILE A
RESPONSE TO DEFENDANT'S MOTION TO COMPEL**

The Plaintiff the United States of America moves the Court to extend the deadline for the United States to file a response to Defendant's Motion to Compel Discovery Responses (ECF # 71) and in support thereof, states as follows:

1. Pursuant to Local Rule CV-7(e) a party has 14 days to file a response to a motion to compel. The United States' response is currently required to be filed on July 9, 2020.

2. The Memorandum Opinion and Order, (Dkt. #75), recently issued by the Court resolved many of the issues in the case. While some significant issues may still remain, it is unclear as to if some of these issues may be moot.

3. The Parties requested the deadlines for the joint pre-trial order to be extended because they needed additional time to evaluate their respective positions, determine what issues would remain for trial and how the case should move forward.

4. Likewise, the United States needs additional time to respond to Defendant's Motion to Compel and to evaluate the requests and responses in light of the Court's ruling. The United States requests to extend the deadline to file its response until July 27, 2020.

5. The request is not made for delay but to allow for an adequate response and to consider the impact of the Court's decision.

6. Plaintiff's counsel has conferred with Defendant's counsel, and Defendant does not oppose the extension requested.

Respectfully submitted,
RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

/s/ Herbert W. Linder
HERBERT W. LINDER
Ohio Bar No. 0065446
Attorneys, Tax Division
U.S. Department of Justice
717 N. Harwood St., Suite 400
Dallas, Texas 75201
Phone: (214) 880-9754
Fax (214) 880-9741
herbert.w.linder@usdoj.go
ATTORNEYS FOR UNITED STATES

CERTIFICATE OF CONFERENCE

On June 30, 2020, I conferred with Rachael Rubenstein, counsel for Defendant Alexandru Bittner, regarding this motion and she stated that she was unopposed to the relief sought herein.

/s/ Herbert W. Linder
HERBERT W. LINDER

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing motion has been made on June 30, 2020, by the Clerk's ECF filing system to:

CLARK HILL STRASBURGER
Farley P. Katz
Rachael Rubenstein
2301 Broadway St.
San Antonio, Texas 78209

/s/ Herbert W. Linder
HERBERT W. LINDER